

SDMS US EPA REGION V -1

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DOCUMENTS.**

147852

Exhibit 3.4

Information Requests No. 29-32

CONFIDENTIAL BUSINESS
INFORMATION

Pursuant to 40 CFR Part 2, Subpart B, Monsanto Company hereby asserts a business confidentiality claim covering this Exhibit and all documents attached thereto.

TJM AHornay
Work Product

EXHIBIT 3.4: MONSANTO INFO REQUEST RESPONSE

RESPONSIVE TO INFO REQUESTS 29-32: WASTEWATER DISCHARGES AND
DISCHARGES TO DEAD CREEK

FROM THE DEST OF EARL BRASFIELD: "BILL PAPAGEORGE" FOLLOWED BY
HANDWRITTEN NOTES: 1920'S LIQUID WASTE FLOWED INTO DEAD CREEK;
'35 DEAD CREEK DREDGED TO FLOW NORTH FROM QUEENY AVE.; '38
ALOCOR PRODUCTION STARTED; 38-51 LANDFILLING PRIMARILY DONE IN
WORK SITE PROPER, INCLUDING CURRENT EDWIN COOPER SITE AND LOT F
WEST OF HWY 3. 42-51 DC DREDGED AGAIN TO STOP ALL FLOW IN
SOUTHERLY DIRECTION; 51-78: LANDFILL AT RIVER USED FOR TOXIC
MATERIALS FROM WGK JFQ AND GEN'L OFFICES. 60-72 WAGGONER MAJOR
TRUCKER FOR WGK PRODUCTS, INCLUDING PCBS.

HISTORY OF KRUMMRICH BY JOHN SPANO: SAFE TO ASSUME THAT DIRECT
DISCHARGES OCCURRED INTO DC UNTIL 1933, WHEN THE SEWER SYSTEM
WAS CONSTRUCTED; AFTER WHICH DISCHARGES ONLY OCCURRED DURING
HIGH RAIN EVENTS. MENTIONS 1935 DREDGING AND FILLING OF PART OF
RIVER. QUEENY AVE CULVERT FILLED IN IN 1968, STOPPING ALL
DISCHARGES OF SURFACE WATER (RUNOFF FLOW). "IT IS KNOWN THAT
DURING 1917 TO 1930S THE PLANT DISPOSED OF ITS WASTES IN A
COMMERCIAL LANDFILL OWNED BY LEO SAUGET IN THE AREA AROUND THE
SAUGET VILLAGE HALL NEAR QUEENY AND NICKEL AVENUES. FROM 1938-51
WASTES DISPOSED PRIMARILY ON PLANT OWNED PROPERTY, EITHER AT THE
SITE OF THE PRESENT COOPER PLANT OR A LANDFILL WEST OF HWY 3.
FROM 1951-1978 OPERATED OWN LANDFILL ON A 20 ACRE COMPANY OWNED
TRACT EAST OF OUR EXISTING RIVER TERMINAL SITE COVERED IN 1979.

SEE MCO0009506-7 FOR ABOVE ADMISSIONS.

MAJOR SEWER REPAIR WORK 1987
MAP SHOWING LOCATION OF REPAIRS
DOCS INDICATE THAT DC WAS BEING USED AS A RETENTION BASIN FOR
WASTES DURING STORMS EVENTS.

From the desk of
EARL N. BRASFIELD

Bill Papagelorge



MCO 6323702

From the desk of
EARL N. BRASFIELD

Bill Papagelorge



MCO 6323702

1920's - LIQUID WASTE FLOWED TO DEAD CREEK.

- SOLID WASTE BURIED ON SITE AND SOUTH OF PLANT IN AREA E. OF CERRO & NEAR VILLAGE HILL.

'31-33 - VILLAGE SEWER SYSTEM CONSTRUCTED BY WPA.

OVERFLOW FROM LUGK WENT TO DEAD CREEK FOR EXCESSIVE RAIN & FLOOD WATER.

'35 - DEAD CREEK DREDGED TO FLOW NORTH FROM QUARRY AVE.

'35 - FILLED IN SAUGET VILLAGE HILL AREA E OF CERRO.

MCO 6323703

'38 - ARCELOR PRODUCTION STARTED

'38-51- LANDFILL PRIMARILY DONE IN LUGK SITE PREPAR INCLUDING CURRENT EDWIN COOPER SITE AND LOT F WEST OF HWY 3.

4-51 - DUGGED UNDER QUENY
- AVE. TO DRAIN WATER - STOPPED
ALL FLOW TOTALLY IN SOUTH
DIRECTION.

'51-78 - LANDFILL AT RIVER USED FOR TRUCK
MATERIAL FROM WGK, JFG, & Gen.
OFFICES RES.

ALSO NITRO, PORT PLASTICS, & ILL. EPA.

'68 - CONCRETE PLUG POURED IN QUENY
AVE. CULVERT TO PERMANENTLY
SEAL HOLE. NO MAJOR FLOW -
MADE CHANGE TO STOP THEN RAIN
WATER.

'78 - WGK LANDFILL CLOSED -
& COVER COMPLETED IN 1980..

MCU 0323704

60-72 - WAGONER TRUCKING WAS MAJOR
TRUCKER FOR THE RIVER PRODUCTS,
INCLUDING THE BOTTLES AND CASES
FOR THE

29

W. G. KRUMMRICH WASTE DISPOSAL (with map)

HISTORY OF PLANT

Monsanto Company purchased the original site of the W. G. Krummrich Plant in Sauget, Ill., in 1917. It is named in honor of a former plant manager. Fewer than 100 employees worked at the 30-acre plant site when it was acquired from the Commercial Acid company. Today the plant stretches over 328 acres, employing more than 1,400 persons with an annual payroll of \$32 million. Of the total employees, 75 percent live in Illinois. The plant manufactures a variety of intermediate chemicals which are important to many industries.

BACKGROUND ON WATER RUNOFF

Back in the early 1900s, Dead Creek started somewhere north, flowed through the industrialized Granite City district, and emptied into the Mississippi River, about five miles south of the area now called Sauget. Dead Creek carried rain water runoff from north of East St. Louis along with domestic and industrial waste water. When Monsanto bought the chemical acid plant in 1917, the creek entered the property on the north side and flowed southward through the plant site. We believe it is safe to assume that industrial waste entered the creek bed throughout its length in those early times.

MCO 0009505

The village of Sauget was incorporated in 1926. In 1933, the Sauget village sewer system was completed. After 1933, all effluent from the plant flowed into the village sewer system. However, during infrequent floods and unusually heavy rainfall, the storm water runoff washed throughout the area, and could have flowed toward the creek.

In 1935, the creek was dredged between Monsanto's plant and Queeny Avenue, and sometime later the portion in the plant was filled in. This occurred shortly after Queeny Avenue was relocated two blocks southward to its present site. A culvert running under Queeny Avenue to the creek was blocked by the Village of Sauget, stopping the runoff flow southward. In 1968, a concrete plug was poured in the culvert to permanently seal the outlet, stopping any runoff flow completely to the south.

PLANT WASTE DISPOSAL

Currently and in recent years, industrial wastes from the Krummrich plant are either handled by contract landfill or contract incineration, or in-plant incineration. Solid non-liquid wastes are sent to an Illinois EPA-approved landfill. Concentrated liquid wastes are shipped to incinerator sites operated by Rollins Environmental Services.

Although no records exist, it is known that in the early times (1917 to the 1930s), the plant disposed of its wastes in a commercial landfill operated by Leo Sauget in the area around the Sauget Village Hall near Queeny and Nickel Avenues. This landfill was filled and covered by the operator.

MCO 0009506

3256

From 1938-1951, wastes were disposed of primarily on plant-owned property, either at the site of the present Cooper plant or a landfill west of Highway 3.

From 1951-1978, we operated our own landfill on a 20-acre company-owned tract east of our existing river terminal. This site was covered and clay-capped in 1979.

SAMPLING PROGRAM

Monsanto, as a responsible industrial citizen of the community, is concerned about Dead Creek. We offered to cooperate with the Illinois EPA and share samples to help develop facts concerning safety of the area. We are hopeful that our assistance will help resolve the situation.

MCO 0009507

Monsanto

COMPANY CONFIDENTIAL

FROM (NAME-LOCATION-PHONE): Steven D. Smith (2542) W.G.K. Plant

Dead Creek

DATE October 21, 1981

cc. P. E. Heisler

SUBJECT

REFERENCE

TO Jack W. Molloy
Warren L. Smull

CONFIDENTIAL 92-CV-204-WUS

*found
file*

I strongly feel that we should recommend to the Village of Sauget Officers that they do not use "Dead Creek" for storm water storage for the following environmental reasons:

1. The recent "Superfund" legislation defines an "Owner and Operator" as "Persons who presently...operate facilities at which hazardous wastes...have been treated, stored, or disposed..." By the Village using the ditch for a storm water lagoon, they would essentially take over as operators of a hazardous waste disposal site, which is unapproved and has been alleged to be a health hazard by one or more individuals.

Once the Village was designated as the operator of the site, they may very well inherit the responsibility and cost of cleaning up the "toxic pollutants", which were dumped there in the past by other unknown individuals. I would guess this cost at \$2 to \$5 million dollars.

2. My understanding of the proposed Village project is that the rain water would be drained back from Dead Creek to the Village sewers. The Association has gone on record with the EPA stating that we have no "point sources" of PCB's within our sewer system. Since the Creek has already been analyzed to contain high concentrations of PCB's, this Creek would become a "point source" of PCB's to the Village. This would not be acceptable to the EPA permit writers for the Treatment Plant's NPDES permit. They would undoubtedly require the Village (or Association) to "pretreat" this source. I assume they would consider some type of carbon absorption as required.
3. The Village could become a Respondent to law suits under the Illinois Nuisance law. Certainly, by storing their storm water in the ditch, a good argument could be made that they are increasing the groundwater pollution in the area, by supplying an additional hydraulic gradient over the contaminated dirt; therefore, increasing the groundwater contamination problem.

For these reasons and others, I feel we should try to convince the Village to use a different alternative in solving their storm water problem.

Steven D. Smith
Steven D. Smith

SDS/jc

CER 008094

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